

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2:18-mn-2873-RMG

**This Document relates to  
ALL CASES**

**DEFENDANT 3M COMPANY'S REPLY BRIEF  
IN SUPPORT OF DEFENDANTS' MOTION FOR PARTIAL SUMMARY  
JUDGMENT ON THE SECOND AND THIRD ELEMENTS OF THE  
GOVERNMENT CONTRACTOR IMMUNITY DEFENSE**

**EXHIBIT LIST**

<b><u>EXHIBIT</u></b>	<b><u>DESCRIPTION</u></b>
59	DLA letter to Ansul Company, Nov. 18, 1977 (Navy05-00002155 to -2158; excerpt from Navy05-00002032)
60	Navy letter to 3M, Jan. 11, 1978 (3M_BELL03090238)
61	Deposition of Dr. Richard Newmark, <i>In re Nylaan Litigation</i> , Oct. 23, 2019 (3M_AFFF_MDL03374556) (excerpts)
62	Christopher Lau, Perfluorinated Compounds: An Overview (in DeWitt, ed., Toxicological Effects of Perfluoroalkyl and Polyfluoroalkyl Substances), 2015
63	TSCA Consent Agreement and Final Order, <i>In the Matter of 3M Company</i> , May 1, 2006 (3M_BELL03197707)